

IN UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK

PASHA PROBIV

Plaintiffs,

Case No: 22-CV-02907-HG-JRC

-against-

PAYCARGO LLC,
EDUARDO DEL RIEGO,
XANDER LAW GROUP, P.A.,
and JASON WEBER

Defendants.

DECLARATION OF JOSHUA LEE WOLF

On this 20th day of September, I Joshua Lee Wolf, respectfully submit this declaration, and declare that the following facts are true and correct to the best of my knowledge:

1. I am over 18 years of age and am competent to make this declaration.
2. I'm a Chief Executive Officer of CargoSprint LLC.
3. I make this declaration on my personal knowledge of events related to the instant lawsuit and overall knowledge of the industry.
4. Wale Up LLC is a New York Corporation with a principal address at 1216 Broadway, 2nd Floor, New York NY.

Relationship between CargoSprint LLC, Pasha Probiv and Wale Up LLC

5. Wale Up LLC and Pasha Probiv provide employee loaning services to CargoSprint LLC.
6. Prior to April 2022 Pasha Probiv was personally involved in some aspects of CargoSprint platform.

7. Due to commencement of PAYCARGO vs. GALBREATH 20-cv-22885-Williams/Torres("Florida Litigation"), Pasha Probiv's involvement in architecture and design of CargoSprint platform was very limited.
8. Both Wale Up LLC and Pasha Probiv were negatively affected by Florida Litigation: Not being able to reap the full benefits of cooperation with CargoSprint LLC due to the threat of the continuing litigation.
9. The cost of litigation CargoSprint LLC incurred due to the Florida Litigation outweigh the benefits of employing Pasha Probiv at CargoSprint LLC.

PayCargo's Business Contacts in New York

10. CargoSprint LLC is a main competitor of PayCargo LLC in cargo payments space in the United States.
11. PayCargo LLC engages in international and interstate commerce.
12. PayCargo conducts substantial amount of business in New York by remitting payments to cargo handling facilities located in John F Kennedy International Airport ("JFK").
13. PayCargo payment system services their vendor clients in New York, including United Cargo, American Airlines Cargo, Luft hansa Cargo, Forward Air, DHL, OEC, Alliance Ground, Yusen Logistics, Kerry Freight, Kuehne+Nagel, DBSchenker, ImpexGLS Inc, JAS Forwarding, APEX Maritime, Express Line Corp, ISF Cargo, Hecny Transportation.
14. PayCargo derives a substantial amount of revenue from transactions with vendors in New York.

I declare under penalty of perjury that foregoing is true and correct.

Date: 09/20/2022

By: _____

Joshua Lee Wolf